

Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

MEMO ENDORSED

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

July 3, 2020

By ECF

Honorable Valerie Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/6/2020

Re: *United States v. Martin Reyes*, 20 Cr. 159 (VEC)

Dear Judge Caproni:

I write with the consent of the Government to request a 30-day adjournment of the September 14, 2020 trial date and all pretrial filing deadlines, to permit Mr. Reyes sufficient time to review discovery and to allow the parties to continue their efforts to reach a pretrial disposition in this matter.

Under the current schedule, pretrial motions are due July 10, 2020, the Government's responses are due July 24, 2020, and the Defendant's replies are due July 31, 2020. Motions *in limine* are due July 31, 2020, with responses due August 14, 2020. Proposed *voir dire* questions and jury charges are due August 3, 2020. I respectfully request that all these deadlines, along with the September 10, 2020 final pretrial conference and the September 14, 2020 trial, be adjourned by approximately 30 days.

The parties consent to the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through the next trial date scheduled by the Court. Thank you for your consideration of this request.

Respectfully submitted,

/s/ Ariel Werner
Ariel Werner
Assistant Federal Defender
212.417.8770
ariel_werner@fd.org

cc: Juliana Murray, Assistant U.S. Attorney

Application GRANTED in part. Pretrial motions are due **August 10, 2020**. The Government's responses are due **August 24, 2020**, with replies due **August 31, 2020**. Motions *in limine* are due **August 31, 2020** with responses due **September 14, 2020**. Proposed voir dire questions and jury charges are due **October 9, 2020**. The trial date is adjourned *sine die*. The Court will set a new trial date as soon as jury trials become feasible again. The parties will be given at least three weeks notice of their new trial date. As previously ordered, pursuant to 18 U.S.C. § 3161(h)(7)(A), the period of time through September 14, 2020 is excluded under the Speedy Trial Act. The Court finds that the ends of justice are served by an exclusion of time due to the COVID-19 pandemic.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over a horizontal line.

7/6/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE